

APR 23 2012

IN THE UNITED STATES DISTRICT COURT  
FOR THE Middle DISTRICT OF TENNESSEE  
Nashville DIVISION

U.S. DISTRICT COURT  
MID. DIST. TENN.

Terry Richard Whitefield Name )

★ Prison Id. No. 503214 )

Terry Richard Whitefield Name )

Prison Id. No. 503214 )

Plaintiff(s) )

(List the names of all the plaintiffs  
filing this lawsuit. Do not use "et  
al." Attach additional sheets if  
necessary.)

Civil Action No. \_\_\_\_\_  
(To be assigned by the Clerk's  
office. Do not write in this space.)

Jury Trial ☒ Yes ☐ No

v. )

Correct Case Solutions Name )

Davidson County Sheriff's Name )  
office; Defendant(s) )

Metropolitan Government of  
Nashville And Davidson County;

(List the names of all defendants  
against whom you are filing this  
lawsuit. Do not use "et al." Attach  
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
FILED PURSUANT TO 42 U.S.C. § 1983

Defendant(s)

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☐ Yes ☒ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs \_\_\_\_\_

Defendants \_\_\_\_\_

2. In what court did you file the previous lawsuit? \_\_\_\_\_  
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)
3. What was the case number of the previous lawsuit? \_\_\_\_\_
4. What was the Judge's name to whom the case was assigned? \_\_\_\_\_
5. When did you file the previous lawsuit? \_\_\_\_\_ (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? \_\_\_\_\_
7. When was the previous lawsuit decided by the court? \_\_\_\_\_ (Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.
- ☐ Yes ☐ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? Davidson County Sheriff's Office 448 Second Ave. North Nashville Tennessee 37201
- B. Are the facts of your lawsuit related to your present confinement?
- ☒ Yes ☐ No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
- \_\_\_\_\_
- D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?
- ☐ Yes ☒ No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☒ Yes ☐ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? Wrote Sickcalls and Grievances but recieved no medical attention

2. What was the response of prison authorities? They said they would give me medical attention for my serious medical needs but never did.

G. If you checked the box marked "No" in question II.E above, explain why not. \_\_\_\_\_

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☐ Yes ☐ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☐ Yes ☐ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? \_\_\_\_\_

2. What was the response of the authorities who run the detention facility? \_\_\_\_\_

L. If you checked the box marked "No" in question II.I above, explain why not. \_\_\_\_\_

**Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.**

### III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Terry Richard Whitefield

★ Prison Id. No. of the first plaintiff: 503214

★ Address of the first plaintiff: West Tennessee State -  
Penitentiary, P.O. Box 1150 Henning Tenn. 38041-1150  
(Include the name of the institution and mailing address, including zip code.  
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: \_\_\_\_\_

Prison Id. No. of the second plaintiff: \_\_\_\_\_

Address of the second plaintiff: \_\_\_\_\_

(Include the name of the institution and mailing address, including zip code.  
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Correct Care Solutions

Place of employment of the first defendant: 448 Second Ave North  
Nashville Tennessee 37201

The first defendant's address: \_\_\_\_\_

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: \_\_\_\_\_

Place of employment of the second defendant: \_\_\_\_\_

The second defendant's address: \_\_\_\_\_

Named in official capacity? ☐ Yes ☐ No

Named in individual capacity? ☐ Yes ☐ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

#### IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

1. On April 28<sup>th</sup> 2010 I, Terry Richard Whitefield was on my way up the stairs during roof recreation. And while I was in between the 5<sup>th</sup> and 6<sup>th</sup> floor slipped and fell in a puddle of water. (With no wet floor sign around visible) And hurt my knees BOTH and lower back, or spine. And right hip and left shoulder in the incident.
2. When I finally made it down four (4) flights of stairs to the clinic on the second floor I was forced to crawl to. Deputy Sheriff Sergeant Mr. Shipley spoke to the nurse. And I was given an ice pack for my right knee and no pain medication for my serious medical injuries.
3. I received X-Rays but the doctor who told me my L4 and L5 vertebrae of my spinal cord was chipping away from the bone of my spine. But he also told me it happened before I came to jail but it happened during my fall at Davidson County Sheriff's Office in which I am still incarcerated, at this date being denied medical attention for my serious injuries, or serious medical needs.

I, Terry Richard Whitefield, swear the foregoing is true and correct on this the 1<sup>st</sup> day of April 2012.

#### V. RELIEF REQUESTED. Specify what relief you are requesting against each defendant.

- |    |                      |           |
|----|----------------------|-----------|
| A. | Compensatory Damages | \$250,000 |
| B. | Pain & Suffering     | \$350,000 |
| C. | Mental Anguish       | \$250,000 |
| D. |                      |           |
| E. |                      |           |

F. I request a jury trial. ☒ Yes ☐ No

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: x Terry Richard Whitefield Date: 4-19-12

o Prison Id. No. 503214

o Address: West Tenn. State Penn. P.O. Box 1150 Henning TN, 38041  
1150

o (Include the city, state and zip code.)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Prison Id. No. \_\_\_\_\_

Address: \_\_\_\_\_

(Include the city, state and zip code.)

**ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT**, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS**, if not paying the civil filing fee.

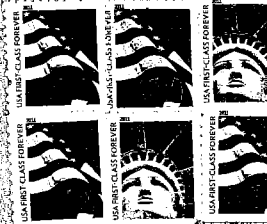
**SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER.** Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.

Terry Whitefeild 503214  
P.O. Box 1150  
Henning TN. 38041-1150

RECEIVED  
IN CLERK'S OFFICE

APR 23 2012

U.S. DISTRICT COURT  
MID. DIST. TENN.



UNited States District Court  
U.S. Courthouse  
801 Broadway  
Nashville TN. 37203

ENTERING  
APR 20 2012  
MAIL ROOM

THE DEPARTMENT OF CORRECTION / WTSP  
HAS NOT BEEN INSPECTED NOR CENSORED AND  
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